

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
MIDDLE DIVISION**

BRIDGETT WATSON ADAMS, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	Case No. 4:24-cv-832-CLM
	)	
3M COMPANY and FICTITIOUS	)	
DEFENDANTS A-J,	)	
	)	
Defendants.	)	

**AMENDED COMPLAINT**

COMES NOW the Plaintiffs, by and through undersigned counsel, and respectfully moves this Honorable Court for leave to file an Amended Complaint pursuant to Rule 15 of the Alabama Rules of Civil Procedure. In support thereof, Plaintiff(s) state as follows:

1. Plaintiffs reallege all allegations as set out in their previously filed Complaint.
2. Plaintiffs seek to correct certain errors regarding the names of parties, removal of certain parties, and the change of address for one party. The proposed changes are as follows:

A. Corrections of Names

- Change Chris Dicks to **Chris Dix**
- Change John Cook to **John Crook**
- Change Marfleata Eckford to **Marfleata Ecxford**
- Change Crystal Hunter to **Crystal Huntley**
- Change Leshon Sharp to **Lashun Sharp**
- Change Rugus Manora to **Rufus Manora**
- Change Sheldon Monthgomery to **Sheldon Montgomery**
- Change Brenton Jamal Nero to **Jamael Nero**
- Change Amber Veasy Raglend to **Amber Veasy Ragland**
- Change Terrence Roberts to **Terence Roberts**
- Change Johnette Sayles to **Johnnetta Sayles**
- Change Darius Taylor to **Darious Taylor**

- Change Tonnie Teague to **Tonnie Teague-Stokes**

B. Removal of Parties

- Remove **Brittany Spurling** from the Complaint
- Remove **Terry Davis, Sr.** from the Complaint

C. Address Change

- Update address for **Anthony Cross** to:  
2020 Noble Street  
Anniston, AL 36201

3. Plaintiff(s) further seek to add additional plaintiffs to the Complaint. The additions are as follows:

E. Additions to Complaint

- Adams, Keidra
- Blount, Priscilla
- Castleberry, Roderick, Sr.
- Clifton, Lindsey
- Curry, C. Whiteside
- Curry, Crystin
- Curry, Justice D.
- Edwards, Diana
- Harrold, Jennifer
- Kidd, Sallie
- Lane, Maryum
- Lane, Terrance Bernard, Sr.
- Lee, Sharde
- Malone, Diane
- Malone, Kenneth

- Malone, Kenneth DeAndre
- McCord, Susan Rollins—as Guardian of John Davis McCord
- McCord, John Rollins
- Melson, Timothy
- Mostella, Greta
- Mostiller, Teresa
- Ragland, Alfred H.
- Ross, Laverne
- Sears, Angela
- Smith, Leon
- Stokes, Willie James
- Tarver, Regina
- Vickers, Anthony Bernard
- Weston, Daniel Scott
- Yow, Sandra Fay

4. The requested amendment will not unduly delay the proceedings or prejudice any party.

WHEREFORE, PREMISES CONSIDERED, Plaintiff(s) respectfully request that this Court grant leave to file this Amended Complaint reflecting the above changes and additions.

Respectfully submitted,

/s/ Dagney Johnson

Dagney Johnson (JOH180)

Attorney for Plaintiffs

OF COUNSEL:

Dagney Johnson Law Group

77 Cross Creek Drive

Birmingham, Alabama 35203

Telephone No.: (205) 937-6564

Email: [dagney@dagneylawgroup.com](mailto:dagney@dagneylawgroup.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have this the 27<sup>th</sup> day of June 2025, filed the above pleading with the Alabama State E-filing system the attorney of record for the parties will receive a copy from the system via email, as registered in the Alafile system. If not, I certify that I have placed a copy of the same in the U.S. mail this day.

/s/ Dagney Johnson

Dagney Johnson  
OF COUNSEL